

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Stanley Simmons,	)	C/A No. 0:19-cv-425-DCN-BM
	)	
Plaintiff,	)	
	)	
Versus	)	
	)	<b>DEFENDANTS DORCHESTER COUNTY</b>
Dorchester County Detention Center;	)	<b>DETENTION CENTER AND</b>
Dorchester County Sheriff, L.C. Knight, In His	)	<b>DORCHESTER COUNTY SHERIFF, L.C.</b>
Official Capacity; South Carolina Commission	)	<b>KNIGHT, IN HIS OFFICIAL CAPACITY</b>
on Indigent Defense; Office of Indigent	)	<b>ANSWERS TO LOCAL RULE 26.01</b>
Defense; Summerville Police Department; and	)	<b>INTERROGATORIES</b>
John Does 1-10,	)	
	)	
Defendants.	)	

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COME NOW Defendants Dorchester County Detention Center and Dorchester County Sheriff, L.C. Knight, In His Official Capacity, by and through their undersigned counsel and respectfully answer the Local Civ. Rule 26.01 (D.S.C.) Interrogatories as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

**RESPONSE: None known by these Defendants.**

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE: Each claim should be tried by jury as this matter involves claims which arise under 42 U.S.C. §1983 as well as State tort claims.**

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**RESPONSE: Not applicable to these Defendants.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**RESPONSE: Based upon the allegations asserted in Plaintiff's Complaint, and upon information and belief, the subject matter of this action arose in Dorchester County, South Carolina.**

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal?

**RESPONSE: None known at this time.**

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**RESPONSE: Dorchester County Detention Center is not a *sui juris* entity capable of being sued and, as such, is not a legally recognized entity under South Carolina or Federal law.**

(G) If you contend that some other person or legal entity is, in whole or in party, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**RESPONSE: None known at this time.**

[signature page and Certificate of Service follow]

Respectfully submitted,

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s/ G. Wade Cooper  
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Attorneys for Defendants Dorchester County  
Detention Center; Dorchester County Sheriff,  
L.C. Knight In His Official Capacity

March 19, 2019  
Mt. Pleasant, South Carolina

### **CERTIFICATE OF SERVICE**

I certify that on this date a copy of the foregoing **DEFENDANTS DORCHESTER COUNTY DETENTION CENTER AND DORCHESTER COUNTY SHERIFF, L.C. KNIGHT, IN HIS OFFICIAL CAPACITY ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES**

was served on each party or counsel of record by ☒ via electronic filing, ☐ mailing, ☐ e-mailing, ☐ facsimile, or ☐ hand delivery in the manner prescribed by the applicable Rule of Civil Procedure.

This 19<sup>th</sup> day of March, 2019.

s/ G. Wade Cooper